

1 Joseph R. Ganley (5643)
2 Brenoch R. Wirthlin (10282)
HUTCHISON & STEFFEN, PLLC
3 Peccole Professional Park
10080 West Alta Drive, Suite 200
4 Las Vegas, Nevada 89145
Telephone: (702) 385-2500
5 Facsimile: (702) 385-2086
jganley@hutchlegal.com
6 bwirthlin@hutchlegal.com

7 Edward R. Nelson III (*Admitted pro hac vice*)
8 Christopher G. Granaghan (*Admitted pro hac vice*)
John P. Murphy (*Admitted pro hac vice*)
9 Carder W. Brooks (*Admitted pro hac vice*)
NELSON BUMGARDNER CONROY PC
10 3131 West 7th Street, Suite 300
Fort Worth, TX 76107
11 Telephone: (817) 377-9111
12 ed@nelbum.com
chris@nelbum.com
13 murphy@nelbum.com
carder@nelbum.com
14

15 *Attorneys for Defendant R2 Solutions LLC*

16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 ALLEGIANT TRAVEL COMPANY,
19 Plaintiff,
20 v.
21 R2 SOLUTIONS LLC,
22 Defendant.

23 **Case No. 2:22-cv-00828-CDS-BNW**
UNOPPOSED MOTION TO EXTEND R2
SOLUTIONS LLC'S TIME
TO SERVE ITS DISCLOSURE OF
ASSERTED CLAIMS AND
INFRINGEMENT CONTENTIONS AND
RESPONSES TO PLAINTIFF'S NON-
INFRINGEMENT CONTENTIONS
(First Request)

1 Defendant R2 Solutions LLC (“Defendant”) brings this unopposed motion to extend the
2 time for it to serve its Disclosure of Asserted Claims and Infringement Contentions and responses
3 to Plaintiff Allegiant Travel Company’s (“Plaintiff”) non-infringement contentions. To this end,
4 Defendant requests, and Plaintiff does not oppose, an extension of seven (7) days to and including
5 **October 25, 2022** to do so. Pursuant to LR IA 6-1, this is the first request to extend the time to
6 serve Defendant’s Disclosure of Asserted Claims and Infringement Contentions and responses to
7 Plaintiff’s non-infringement contentions.

8 This request is not made for the purpose of delay. R2 previously filed a motion to stay
9 discovery pending resolution of its motion to dismiss, which, if granted, would have stayed the
10 deadline for R2 to serve its Disclosure of Asserted Claims and Infringement Contentions and
11 responses to Plaintiff’s non-infringement contentions. The Magistrate Judge denied R2’s motion
12 to stay on October 13, 2022, five days before R2’s current deadline. Patent cases are complex.
13 This case involves seven distinct patents, at least three of which have not been litigated in prior
14 patent infringement litigation brought by Defendant in the United States District Court for the
15 Eastern District of Texas. As such, there is much for Defendant’s counsel to investigate, analyze,
16 collect, and consider in creating and preparing Defendant’s Disclosure of Asserted Claims and
17 Infringement Contentions and responses to Plaintiff’s non-infringement contentions. In light of the
18 short amount of time between the Magistrate Judge’s denial of R2’s motion to stay and R2’s
19 deadline, and the amount of work involved with preparing infringement contentions, R2
20 respectfully submits that there is good cause for the requested extension. Defendant has conferred
21 with counsel for Plaintiff, and Plaintiff does not oppose the requested extension.

22 ///

23

24 ///

25

26 ///

27

28 ///

1 For the foregoing reasons, Defendant respectfully asks that the Court grant this unopposed
2 motion re-setting Defendant's deadline to serve its Disclosure of Asserted Claims and
3 Infringement Contentions and responses to Plaintiff's non-infringement contentions to October 25,
4 2022.

5 Dated this 14th day of October, 2022.
6

7 HUTCHISON & STEFFEN, PLLC
8

9 /s/ *Brenoch Wirthlin*
10

11 Joseph R. Ganley (5643)
12 Brenoch R. Wirthlin (10282)
13 Peccole Professional Park
14 10080 West Alta Drive, Suite 200
15 Las Vegas, Nevada 89145
16 jganley@hutchlegal.com
17 bwirthlin@hutchlegal.com
18

19 Ed Nelson, III (*Admitted pro hac vice*)
20 Christopher G. Granaghan (*Admitted pro hac
21 vice*)
22 John P. Murphy (*Admitted pro hac vice*)
23 Carder W. Brooks (*Admitted pro hac vice*)
24 Nelson Bumgardner Conroy PC
25 3131 West 7th Street, Suite 300
26 Fort Worth, Texas 76107
27 ed@nelbum.com
28 chris@nelbum.com
john@nelbum.com
carder@nelbum.com

29 Attorneys for Defendant
30 R2 Solutions LLC
31

32 **ORDER**
33

34 **IT IS SO ORDERED**

35 **DATED:** 2:58 pm, October 17, 2022

36 
37

38 **BRENDA WEKSLER**
39 **UNITED STATES MAGISTRATE JUDGE**

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of October, 2022, I caused a true and correct copy of the foregoing **UNOPPOSED MOTION TO EXTEND R2 SOLUTIONS LLC'S TIME TO SERVE ITS DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS AND RESPONSES TO PLAINTIFF'S NON-INFRINGEMENT CONTENTIONS** to be submitted electronically for filing and service with the United States District Court for the District of Nevada via the Electronic Filing System to the following:

Patrick H. Hicks (4632)
Kelsey E. Stegall (14279)
LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway, #300
Las Vegas, Nevada 89169
phicks@littler.com
kstegall@littler.com

Michael A. Oblon
JONES DAY
51 Louisiana Avenue, N.W.
Washington, D.C. 20001
moblon@jonesday.com

Keith Davis
JONES DAY
2727 North Harwood
Dallas, Texas 75201
kbdavis@jonesday.com

H. Albert Liou
JONES DAY
717 Texas Avenue, Suite 3300
Houston, Texas 77002
aliou@jonesday.com

*Attorneys for plaintiff
Allegiant Travel Company*

/s/ Danielle Kelley

An employee of Hutchison & Steffen, PLLC